

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                                   |   |                             |
|-----------------------------------|---|-----------------------------|
| STEVE HICKMAN,                    | : |                             |
|                                   | : |                             |
| Plaintiff,                        | : | CONSOLIDATED                |
|                                   | : | Civil Action No. 05-811-KAJ |
| v.                                | : |                             |
|                                   | : |                             |
| DETECTIVE MARZEC, in his          | : |                             |
| individual and official capacity, | : |                             |
| DAVID HUME IV, TOWN OF            | : |                             |
| DELMAR, DEPARTMENT                | : |                             |
| OF DRUG ENFORCEMENT,              | : |                             |
| and AGENT TOM JACOBS,             | : |                             |
|                                   | : |                             |
| Defendants.                       | : |                             |
| <hr/>                             |   |                             |
| TAWANDA WEATHERSPOON,             | : |                             |
|                                   | : |                             |
| Plaintiff,                        | : |                             |
|                                   | : |                             |
| v.                                | : |                             |
|                                   | : |                             |
| DETECTIVE MARZEC, AGENT           | : |                             |
| TOM JACOBS, TOWN OF               | : |                             |
| DELMAR, and AGENT CHRIS           | : |                             |
| QUAGLINO,                         | : |                             |
|                                   | : |                             |
| Defendants.                       | : |                             |
| <hr/>                             |   |                             |
| SANDRA J. WHITE,                  | : |                             |
|                                   | : |                             |
| Plaintiff,                        | : |                             |
|                                   | : |                             |
| v.                                | : |                             |
|                                   | : |                             |
| DETECTIVE MARZEC, AGENT           | : |                             |
| TOM JACOBS, TOWN OF               | : |                             |
| DELMAR, and AGENT CHRIS           | : |                             |
| QUAGLINO,                         | : |                             |
|                                   | : |                             |
| Defendants.                       | : |                             |

**RULE 26(a)(1) INITIAL DISCLOSURES**

COMES NOW, Ronald Marzec, Thomas Jacobs, and Christopher Quaglino (the “Individual Defendants”), by their attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Seth M. Beausang, Assistant United States Attorney, who, pursuant to the Individual Defendants’ obligations under Fed. R. Civ. P. 26(a)(1), disclose the following:

**Rule 26(a)(1)(A)**

1. Ronald Marzec, Task Force Officer, has knowledge about the search that is the basis of these lawsuits.
2. Christopher Quaglino, Agent, has knowledge about the search that is the basis of these lawsuits.
3. Thomas Jacobs, Special Agent, has knowledge about the search that is the basis of these lawsuits.
4. Marvin Mailey, Task Force Officer, has knowledge about the search that is the basis of these lawsuits.
5. Jason Pires, Task Force Officer, has knowledge about the search that is the basis of these lawsuits.
6. Thomas Tyndal, Detective, Georgetown Police Department, has knowledge about the search that is the basis of these lawsuits.
7. Floyd Toomey, Chief of Police, Ellendale Police Department, has knowledge about the search that is the basis of these lawsuits.

**Rule 26(a)(1)(B)**

1. The search warrant and accompanying affidavit that were attached as Exhibit B to

the Individual Defendants' motion to dismiss and/or for summary judgment.

2. A report on the search and on the arrest of Steve Hickman, possessed by the Individual Defendants.

3. The Individual Defendants are still investigating the events that gave rise to this lawsuit and potential defenses thereto and, as the Individual Defendants become aware of documents, data compilations or tangible things in their possession, custody, or control that might support their defenses, copies of the same, or their description by category and location shall be promptly disclosed to Plaintiffs.

**Rule 26(a)(1)(C)**

Does not apply to the Individual Defendants.

**Rule 26(a)(1)(D)**

Individual Defendants have nothing to disclose.

DATED: August 9, 2006.

Respectfully submitted,

COLM F. CONNOLY  
United States Attorney

/s/ Seth M. Beausang  
Seth M. Beausang (DE I.D. No. 4071)  
Assistant United States Attorney  
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P.O. Box 2046  
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(302) 573-6277, ext. 149  
(302) 573-6220 (fax)

**Certificate of Service**

I, Seth M. Beausang, hereby attest under penalty of perjury that on this 9th day of August, 2006, I caused two copies of the Individual Defendants' Rule 26(a)(1) Initial Disclosures to be served on the Plaintiffs by First Class Mail at the following addresses:

Steve A. Hickman  
9008 Green Top Rd.  
Lincoln, DE 19960

Tawanda Weatherspoon  
9008 Green Top Rd.  
Lincoln, DE 19960

Sandra White  
9008 Green Top Rd.  
Lincoln, DE 19960

and on the following counsel for the Town of Delmar by electronic filing:

Daniel A. Griffith, Esq.  
1220 Market Street, 5th Floor  
Wilmington, DE. 19801

/s/ Seth M. Beausang  
Seth M. Beausang (De. I.D. No. 4071)